REMARKS

Applicants and the undersigned are most grateful for the time and attention accorded this application by the Examiner. The Office is respectfully requested to reconsider the rejections applied against the instant application in light of the claim amendments rendered herein and the remarks presented below.

The withdrawal of the objection to the drawings in view of the proposed drawing amendment is noted.

Claims 1-19 are pending in the instant application. Claims 1-19 were rejected under 35 U.S.C. 103 in view of "Applicant's admittance" and Haug et al.

Reconsideration and withdrawal of the rejection are hereby respectfully requested.

The remarks presented in the Amendment filed February 28, 2002, are again relevant. As discussed therein, the "admittance", as set forth in Figure 1, relates merely to a conventional indexing arrangement in which there is no translator or translation model involved.

Independent Claims 1, 10 and 19 as currently written indicate that quality of textual input is improved for entry into an indexing database, whereby errors produced in the recognizing of words and which are detrimental to indexing performance are reduced. It is respectfully submitted that the applied art does not teach or suggest such an arrangement.

c Pocket No. YO-999-599 (590.005)

Independent Claims 1, 10 and 19 emphasize the provision of clean data for subsequent indexing. Thus, the present invention, in accordance with at least one presently preferred embodiment, does not relate to indexing *per se* but, essentially, to a pre-processing step in the context of indexing. As such, clean data provided in accordance with at least one embodiment of the present invention could be "plugged in" to a larger, general indexing arrangement.

In the Amendment filed February 28, 2002, a non-restrictive and illustrative example of an embodiment of the present invention (with relation to Fig. 2a and pp. 6-7 of the instant specification) is still relevant here, insofar as raw output from a speech recognizer is automatically transformed into an improved output of textual features for being stored in a database. Such automation is facilitated, in accordance with at least one embodiment of the present invention, via an automatically trained translation model. (See p. 8, lines 4-14 of the instant specification). Data deriving from such training may assist in the translator's subsequent transformations of "noisy" data into "clean" data. Through knowledge, or "contextual intelligence", gained from a statistical analysis of the changes actually undertaken, further refinements in the automatic translation model can be undertaken.

Such advantages cannot be derived from the arrangements contemplated by Haug et al. Perhaps a suitable basis of comparison between Haug et al. and at least one embodiment of the present invention may be found in connection with Fig. 3 of Haug et al.. Essentially, Haug et al. involves the use of special dictionaries (see, e.g., Col. 6, lines 41-53). Additionally, the use of an entry for a special dictionary is discussed (with

(MON) JAN 5 2004 23:27/ST. 23:25/NO. 6319784600 P 12
Att. Oocket No. YO-999-599
(590.005)

respect to Fig. 4) at Col. 6, line 54 - Col. 7, line of Haug et al. Thus, Haug et al. essentially involves the creating of index entries in canonical form, whereby "noisy" textual features are not at all automatically cleaned up before being entered into an indexing database. Indeed, to cite from the instant application (see the paragraph therein bridging pp. 8 and 9), the perceived term "Monica whiskey" would likely still be indexed as "Monica whiskey" using the arrangements contemplated by Haug et al., since both words are valid dictionary words. Lacking the "contextual intelligence" afforded in accordance with at least one embodiment of the present invention, the "noisy" text of "Monica whiskey" would not be corrected to the "clean" text of "Monica Lewinsky". Such correction, indeed, is contemplated in accordance with at least one embodiment of the present invention as a result of an automatically trained translator which automatically improves the quality of textual input for entry into an indexing database.

In view of the foregoing, it is respectfully submitted that independent Claims 1, 10 and 19 fully distinguish over the applied art and are thus allowable. By virtue of dependence from what are believed to be allowable independent Claims 1 and 10, it is respectfully submitted that Claims 2-9 and 11-18 are also allowable.

Applicants recognize that the Office has considered the prior art made of record but not applied against the claims to have been not sufficiently relevant as to have been applied against the claims.

(MON) JAN 5 2004 23:28/ST. 23:25/NO. 6319784600 P 13
Att. Docket No. YO-999-599
(590.005)

In summary, it is respectfully submitted that the instant application, including Claims 1-19, is in condition for allowance. Notice to the effect is hereby earnestly solicited.

Respectfully submitted,

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